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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-10-629

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UNITED STATES OF AMERICA

- against -

LUVMAN ALLISON,
also known as
"Luvman Carter"
"Don Latif" and
"Harrison Carter,"

Defendant.

C O M P L A I N T

(T. 21, U.S.C., § 963
and 960(a)(1))

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EASTERN DISTRICT OF NEW YORK, SS:

JAMES HOLT, being duly sworn, deposes and states that he is a Special Agent with the with United States Immigration and Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

Upon information and belief, on or about and between May 5, 2008 and May 28, 2010, within the Eastern District of New York and elsewhere, the defendant LUVMAN ALLISON, also known as "Luvman Carter," "Don Latif" and "Harrison Carter," together with others, did knowingly and intentionally conspire to possess with intent to distribute a controlled substance, which offense involved one kilogram or more of a substance containing heroin, a

Schedule I controlled substance, in violation of Title 21, United States Code, Section 952(a).

(Title 21, United States Code, Sections 963 and 960(a)(1)).

The source of your deponent's information and the grounds for his belief are as follows:^{2/}

1. On March 28, 2010, an co-conspirator ("CC") was arrested at John F. Kennedy International Airport ("JFK Airport") with over one kilogram of heroin on his person. Thereafter, based on statements made to me by CC, a search warrant was obtained for CC's email account ("CC's E-mail Account"). CC's e-mail account contained emails from a Yahoo! account (donlatif11@yahoo.com) and a Facebook account, that were registered to "Don Latif" and "Luvman Carter" respectively, in which the defendant discussed narcotics transactions with the CC. I confirmed that the account holder of the Yahoo! email address donlatif11@yahoo.com is the defendant LUVMAN ALLISON, also known as "Luvman Carter," "Don Latif" and "Harrison Carter" based on the fact that donlatif11@yahoo.com sent a copy of his passport in the name of LUVMAN ALLISON to another individual. In addition, an insurance policy confirmation in the name of LUVMAN ALLISON was emailed from Atlas/International Citizen Group Insurance

^{2/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

Trust to the email donlatif11@yahoo.com. I also determined that the Facebook account associated with the name "Luvman Carter" is connected to the email address donlatif11@yahoo.com because Facebook messages sent to "Luvman Carter" are also sent to donlatif11@hotmail.com.

2. A review of CC's E-mail Account revealed that the defendant has been involved in a narcotics conspiracy in which he arranges for couriers to bring narcotics into the United States. For example, on July 25, 2009, the defendant LUVMAN ALLISON, also known as "Luvman Carter," "Don Latif" and "Harrison Carter," wrote to CC from a Facebook account in which the defendant explicitly discussed the methods he uses to covertly transport narcotics. The defendant wrote about his concern that their methods of packing were known to law enforcement and that one their associates had been arrested. He specifically stated that:

zombie was busted so it means that the ppl
knw the style of our packing . .so they
arrested this guy as well. I can email u de
tkr code and find out yurself they will tell
u the person did not baord de flight ask them
to check why..they tell you they see sumtn
written in there like national security bt
they cant tell you much so what does this
means menn I am ashamed u still dnt have
trust 4me .. I am truilly asshamed ..this is
not gud 4bness ma brada." [sic].

Based on the context of this email and other emails written by the defendant, I determined that the phrase, "this is not gud

4bness ma brada," refers to the fact that the arrest is not good for the business of narcotics trafficking.

3. Based on a review of the defendant's correspondence on CC's E-mail Account, on May 12, 2010, a search warrant was obtained for the defendant's e-mail account at donlatif11@yahoo.com (defendant's "E-mail Account"). A review of the defendant's E-mail Account confirmed that the defendant LUVMAN ALLISON, also known as "Luvman Carter," "Don Latif" and "Harrison Carter," is involved in narcotics trafficking. For example, there were several e-mail messages from the defendant's E-mail Account in the name of "Don Latif," in which the defendant threatened CC regarding narcotics. In one e-mail message, the defendant reminded CC that he gave CC something to "eat" and that if the defendant did not get his "stuff" back that CC would start feeling sick and might die soon. In another e-mail message, the defendant continued to threaten CC about getting his "stuff" back and also discussed another co-conspirator who also sent e-mails to CC regarding narcotics trafficking. Based on my training and experience, narcotics traffickers often speak in code to disguise the true purpose of their communications.

4. The defendant LUVMAN ALLISON, also known as "Luvman Carter," "Don Latif" and "Harrison Carter," sent similar e-mail messages using code language to other individuals. For

example, the defendant told an individual in an e-mail message: "i also happen to have food in ghana and and i cannot use some one's passport to eat and travel as passport mite cos me problm" [sic]. Based on my training and experience, Ghana, where the defendant said that he had "food," is considered a source country for heroin trafficking.

5. The defendant's E-mail Account also contained messages from a known narcotics courier (the "COURIER"). On July, 17, 2009, the COURIER sent an email to the defendant denying that he/she stole the "food" ("if i stole teh food so why i ask u to help me?" [sic]). The COURIER further explained that if the defendant wanted to know everything, that he should look at CC's e-mail account for which the COURIER provided the password.

6. A review of the defendant's E-mail Account also shows that the defendant LUVMAN ALLISON, also known as "Luvman Carter," "Don Latif" and "Harrison Carter," arranged travel reservations for CC, who brought narcotics into the United States. For example, based on a reservation confirmation record in the defendant's email account, the defendant arranged a hotel reservation for CC in Manhattan on January 21, 2009. CC told law enforcement that his only purpose in traveling to the United States was to bring narcotics.

WHEREFORE, your deponent respectfully requests that an

arrest warrant be issued for the defendant LUVMAN ALLISON, also known as "Luvman Carter," "Don Latif" and "Harrison Carter," so that he may be dealt with according to law.



JAMES HOLT
Special Agent
Immigration and Customs
Enforcement

Sworn to before me this
4th day of June 2010

THE HONORABLE VIKTOR V. POHORELSKY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK